
**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**

v. : **Mag. No. 19-4410**

TAJI GIOVANNI STREET :


I, James Morrissey, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations, and that this complaint is based on the following facts:

SEE ATTACHMENT B


continued on the attached page and made a part hereof.



Special Agent James Morrissey
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me and subscribed in my presence,

September 20, 2019 at Newark, New Jersey
Date City and State



Honorable Michael A. Hammer
United States Magistrate Judge

ATTACHMENT A

On or about October 9, 2018, in Essex County, in the District of New Jersey, and elsewhere, defendant

TAJI GIOVANNI STREET

did knowingly make, under oath, or as permitted under penalty of perjury under section 1746 of Title 28, United States Code, a false statement with respect to a material fact in a document required by the immigration laws and regulations of the United States, to wit, a Form I-130 Petition for Alien Relative.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

ATTACHMENT B

I, James Morrissey, am a Special Agent with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), Homeland Security Investigations ("HSI"). As such, I have experience in investigating criminal violations of immigration laws, including violations relating to the production and filing of fraudulent immigration documents, and I have personally participated in more than 50 investigations of immigration and document fraud. I have also received training in the detection of immigration fraud, and I am certified by the ICE Forensics Document Laboratory to instruct law enforcement entities in the detection of fraudulent documents. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and evidence. Where statements of others are related herein, they are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation.

Overview

1. At all times relevant to this Complaint, defendant Taji Giovanni Street ("STREET") was a lawful permanent resident ("LPR") living in Essex County, New Jersey.

2. In or around March 2019, HSI began investigating STREET for, among other things, soliciting and assisting aliens to file fraudulent documents in order to obtain immigration benefits. The investigation revealed that STREET had entered into a fraudulent marriage with another individual ("Individual-1"), for the purpose of assisting Individual-1 in gaining legal immigration status in the United States.

The I-130 Visa Program

3. Under U.S. law, an LPR can seek an immigrant visa on behalf of his spouse by filing a Petition for Alien Relative on United States Citizenship and Immigration Services ("USCIS") Form I-130 (an "I-130 Petition"), which requires the petitioning LPR to provide information about his spouse and about the marriage.

4. The I-130 Petition requires the petitioning LPR to certify, under penalty of perjury, that the information and documents submitted in connection with the petition are complete, true, and correct.

5. The I-130 Petition also warns of the potential consequences of

filing a fraudulent petition based on a sham marriage:

WARNING: USCIS investigates the claimed relationships and verifies the validity of documents you submit. If you falsify a family relationship to obtain a visa, USCIS may seek to have you criminally prosecuted.

PENALTIES: By law, you may be imprisoned for up to 5 years or fined \$250,000, or both, for entering into a marriage contract in order to evade any U.S. immigration law. In addition, you may be fined up to \$10,000 and imprisoned for up to 5 years, or both, for knowingly and willfully falsifying or concealing a material fact or using any false document in submitting this petition.

The Fraudulent Marriage

6. On or about March 25, 2019, law enforcement agents conducted a lawful search of STREET's cell phone (the "Street Phone"). That search revealed the following communications regarding STREET's fraudulent marriage:

a. On or about May 25, 2018, the user of the Street Phone exchanged a series of text messages with Individual-1 concerning the possibility of a fraudulent marriage between them:

Individual-1: So happy for you
Bout the citizenship

STREET: Ty
I still got 4 months
So if you know any one that wants to buy a green card
let me know
Yessssssddddd

Individual-1: What do you mean
Buy?

STREET: Lol
So a lot of us citizens they will charge something that
is undocumented a fee to marry them and they get
their residence

Individual-1: Lol
I want to get a green card then
I thought
U are selling

Green cards
I am like
This dude
Is in some deep advanced shit

STREET: Lol
No
I wish
Hey if the price is right I'll do it for a guy too

Individual-1: Wait u serious?

STREET: Why not

* * * *

Individual-1: So dude how much u want for green card, u didn't say anything?
Oh I'll bring
It
Plan to come around 12
How much u want. . . .

b. Later the same day, on or about May 25, 2018, the user of the Street Phone exchanged a series of text messages with an individual referred to herein as "Individual-2," indicating that STREET was considering entering into a fraudulent marriage with Individual-1:

STREET: Maybe it's because I got 2 big news
I got a promotion
And my str8 friend offered me \$20k to marry him

Individual-2: CONGRATULATIONS

STREET: Not
His visa is about to expire
Ohhh you mean the promotion
Lol
I'm slow at times

Individual-2: I'm talking about the promotion

STREET: I just caught it

Individual-2: You answered the question I was going to ask about your friend

STREET: I don't know

Individual-3: Are you willing to help him out

STREET: I'm lost and shocked
I want to
But how will I explain it to my family

Individual-2: That . . . I'm not sure

c. On or about July 26, 2018, the user of the STREET Phone exchanged a series of text messages with an individual referred to herein as "Individual-3," indicating that STREET was about to enter into a fraudulent marriage with Individual-1:

STREET: Bro
Imma tell you something
You have to take it to your grave

* * * *

I'm helping [Individual-1] out
It never register in my brain until now

Individual-3: What

STREET: [Individual-1] and I getting married so he can get his green card

Individual-3: Bro are you sure
You want to do that

STREET: Not 100% but yeah

Individual-3: Are they gonna believe that you guys are married on a good faith
And you really gay?

STREET: Fuck no I'm not
None of us is

Individual-3: They are smart enough to know that
You dont look gay

STREET: I'm a good actor

d. On or about October 9, 2018, the user of the Street Phone sent a text message instructing Individual-1 that, upon mailing the marriage application, Individual-1 should remove all traces of his current and former girlfriends from his social-media accounts and from his home.

7. On or about July 3, 2018, STREET and Individual-1 obtained a marriage license from the City of Passaic, New Jersey. That license lists STREET and Individual-1 as residing together at an address in Passaic County, New Jersey (the "Passaic Address").

8. On or about July 26, 2018, STREET and Individual-1 were married by the City Clerk of Passaic, New Jersey. Their marriage certificate, like the marriage license, shows STREET and Individual-1 as residing together at the Passaic Address.

9. On or about October 9, 2018, STREET submitted a Form I-130 Petition, which he signed under penalty of perjury, seeking an immigration visa for Individual-1 as his spouse.